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Attorneys for Plaintiffs
TRACY ANDERSON MIND AND BODY, LLC
and T.A. STUDIO NEW YORK LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TRACY ANDERSON MIND AND BODY,
LLC, a Delaware limited liability company;
and T.A. STUDIO NEW YORK LLC, a
California limited liability company,

Plaintiffs,

v.

MEGAN ROUP, an individual; and THE
SCULPT SOCIETY, LLC, a California
limited liability company,

Defendants.

Case No. 2:22-cv-04735-PSG-E

Hon. Philip S. Gutierrez

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION TO
COMPEL DEFENDANTS TO
PROVIDE FURTHER
RESPONSES TO FIRST SETS OF
RFPS, INTERROGATORIES,
AND RFAS**

DISCOVERY MATTER

Discovery Cutoff: February 10, 2024
Pre-Trial Conf.: November 1, 2024
Trial Date: November 14, 2024

Hearing
Judge: Hon. Charles F. Eick
Date: February 9, 2024
Time: 9:30 a.m.
Courtroom: 750

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on February 9, 2024 at 9:30 a.m., or as soon thereafter as the matter may be heard in Courtroom 750 of the Roybal Federal Building, 255 East Temple Street, Los Angeles, California 90012, Plaintiffs Tracy Anderson Mind and Body, LLC and T.A. Studio New York LLC (“Plaintiffs”) will and hereby do move, under Federal Rule of Civil Procedure 37 and Local Rule 3702, for an order compelling Defendants Megan Roup (“Roup”) and The Sculpt Society, LLC (“TSS,” and collectively, “Defendants”) to provide further responses to the following discovery requests:

- Plaintiffs’ First Set of Requests for Production to Defendants (Nos. 19, 20, and 25-27);
- Plaintiffs’ First Set of Interrogatories to Roup (Nos. 1 and 2);
- Plaintiffs’ First Set of Interrogatories to TSS (Nos. 1, 2, and 5); and
- Plaintiffs’ First Set of Requests for Admission to Roup (Nos. 1-7, 9, 10, 13, and 15).

This Motion is based on this Notice of Motion, the accompanying Joint Stipulation and all papers attached thereto, any supplemental memoranda filed under Local Rule 37-2.3 and all papers attached thereto, arguments of counsel at the Motion’s hearing, and the papers, records, and pleadings on file herein.

This Motion is made following various meet and confer efforts, during which the parties were unable to resolve the disputes that are the subject of this Motion. Those meet and confer efforts include:

- Plaintiffs’ December 14, 2023 meet and confer letter under Local Rule 37-1;
- The parties’ meet and confer correspondence from December 16, 2023 through January 15, 2023.
- The parties’ December 26, 2023 telephonic meet and confer;

- The parties' January 8, 2024 telephonic meet and confer; and
- The parties' January 9, 2024 telephonic meet and confer.

Dated: January 19, 2024

DLA PIPER LLP (US)

By: /s/ Gina Durham

GINA DURHAM

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Attorneys for Plaintiffs

TRACY ANDERSON MIND AND

BODY, LLC and T.A. STUDIO

NEW YORK LLC